

Message

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Sent: 5/26/2021 12:02:44 PM
To: Javier, Julie [Javier.Julie@epa.gov]; Muhammad, Maryam K. [Muhammad.Maryam@epa.gov]; Arrington, Linda [Arrington.Linda@epa.gov]; Bartow, Susan [Bartow.Susan@epa.gov]
Subject: SFIREG Meeting Prep Notes

Good Morning all,

Attached are the notes from our discussion about the SFIREG meeting. If you want any elaboration or have any questions about anything I have written please let me know.

SFIREG Questions for EPA:

- These neonicotinoid treated seeds are exempt from FIFRA regulations per 40 CFR 152.25(a) Treated Articles or Substances; what will it take to see the treated article determination changed?
 - It will take a regulation change to see the treated article determination change.
 - Changing the 40CFR treated article exemption which would take a good amount of time.
- When does EPA anticipate finalizing the answers to the coated seed petition?
 - We are currently working on the petition diligently and cannot give a timeline at this moment.
 - Cannot say that we will finish it next quarter.
 - We have to develop options and they have to be reviewed by division management and OGC.
 - We will also have to brief the IO (immediate office) and eventually the AA.
- How is this situation similar/different from regulating persistence as we have seen in grass clippings, mulch, manure, etc...?
 - This is not our question. EFED or HED needs to answer this question.
 - There was recently an ID that involved persistence in Cathryn's branch. Khue Nguyen is the TL for this (she may want to talk about that).
- Are we again looking to regulate beyond the user?
 - This is referring to the downstream effects and uses.
 - We cannot answer this since we are still making determinations of what the possibilities are.
 - If we go down that route then it is one of the aspects we need to consider.
- With changes/improvements in seed coating technology is there an increase in residual presence?
 - Not our question.
- If so, is this being considered by EPA?
 - Not our question.
- Were/are the seed treatment associations in contact with EPA?
 - We are not aware of any seed treatment associations that are in contact with the EPA about the treated seed petition
- Regardless of whether they are considered treated articles under FIFRA, are treated seeds regulated under the Federal Seed Act?
 - This is through UDSA.
 - Amber will look up to see if EPA has said anything about this.
- Does the EPA's risk assessments for pesticides used to treat seeds evaluate the potential risks from exposures to the pesticides from the plant or vegetation that grows from the seeds. If not, would EPA consider an evaluation of these potential risks, as they do for runoff, dusting, and consumption of unsown seed?
 - This will be HED and EFED question.

Thank you,
Quinn

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